

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

ROBERTA AGYEMAN, et al.

Civil Docket Number: 18-cv-05320

PLAINTIFFS,

THIRD NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Roberta Agyeman et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 7 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
148	Williams, Remy	IL	United States	Calixte, Felix	Brother	¶ 42
149	Williams, Kaream	TX	United States	Calixte, Felix	Brother	¶ 42

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
150	Williams, Kizzy	NC	United States	Calixte, Felix	Sister	¶ 42
151	Carson, James M.	NY	United States	Carson, James Jr.	Son	¶ 46
152	Chada-Merritt, Tammy M.	VA	United States	Chada, John	Daughter	¶ 58
153	Clark, Gabriel	PA	United States	Clark, Benjamin K.	Son	¶ 66
154	Clark, Taj-Pierre	PA	United States	Clark, Benjamin K.	Son	¶ 66
155	Hantz, Brittany	PA	United States	Clark, Benjamin K.	Daughter	¶ 66
156	McAvinue, Thomas G.	NY	United States	Clarke, Donna	Brother	¶ 67
157	McAvinue-McCarthy, Patricia	NY	United States	Clarke, Donna	Sister	¶ 67
158	Alexander-McGee, Linda	NY	United States	Conway, Brenda E.	Sister	¶ 77
159	Alexander, April	NY	United States	Conway, Brenda E.	Sister	¶ 77
160	Conway, Mandell	NY	United States	Conway, Brenda E.	Son	¶ 77
161	Alexander, Danielle	NY	United States	Conway, Brenda E.	Sister	¶ 77
162	Cordero, Moises Jr.	NY	United States	Cordero, Alejandro	Brother	¶ 82
163	Cordero, Teresa	NY	United States	Cordero, Alejandro	Mother	¶ 82
164	Cordero, Wellington	NY	United States	Cordero, Alejandro	Brother	¶ 82
165	Marisay, Robert	GA	United States	Corrigan, Georgine R.	Brother	¶ 83
166	Rivera, Uriel Jr.	NY	United States	Costanza, Digna	Brother	¶ 84

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
167	Rivera, Uriel Sr.	NY	United States	Costanza, Digna	Father	¶ 84
168	Rivera, Albertina	NY	United States	Costanza, Digna	Mother	¶ 84
169	Rivera, Ingrid	NY	United States	Costanza, Digna	Sister	¶ 84
170	Coyle, Regina	NY	United States	Coyle, James R.	Mother	¶ 85
171	Coyle, Katherine	NY	United States	Coyle, James R.	Sister	¶ 85
172	Coyle, Joseph	NY	United States	Coyle, James R.	Brother	¶ 85


Dated: June 24, 2018

Respectfully submitted,

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 COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman